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May 10, 2001

PATTON BOGGS LLP

ATTORNEYS AT LAW

Benjamin L. Ginsberg 202-457-6405 bginsberg@pattonboggs.com

VIA COURIER

Jeff S. Jordan Supervisory Attorney Federal Election Commission 999 E Street, NW Washington, DC 20463

Re: MUR 5197

1998 Republican House-Senate Dinner Committee and Trudy Matthes Barksdale, as Treasurer

Dear Mr. Jordan:

This responds to the April 23, 2001 letter from the Federal Election Commission ("Commission") notifying the 1998 Republican House-Senate Dinner Committee and Trudy Matthes Barksdale, as treasurer (collectively "Dinner Committee"), of the complaint filed against it by the National Taxpayers Union ("NTU") in the above referenced Matter Under Review ("MUR"). The Complaint was received on April 26, 2001. The Statement of Designation of Counsel form is attached. (See attachment 1.) For the reasons set forth below, there is no basis in law or fact supporting the complaint and the Commission should dismiss it as applied to the Dinner Committee.

The Dinner Committee terminated on August 27, 1999. (See attachment 2.) It was a joint fundraising committee established pursuant to 11 C.F.R. § 102.17 by the National Republican Congressional Committee ("NRCC") and the National Republican Senatorial Committee ("NRSC"). As such, the Dinner Committee established accounts to accept contributions for the NRCC and NRSC before transferring all proceeds, minus expenses, to the participating Committees. The Dinner Committee also established several non-federal accounts



PATTON BOGGS LLP

Jeff S. Jordan May 10, 2001 Page 2

in accordance with 11 C.F.R. § 102.17(c)(3), including a building fund account. ¹ See also 2 U.S.C. § 431(8)(B)(viii) & 431(9)(B)(viii); 11 C.F.R. § 114.1(a)(2)(ix). During the Dinner Committee's existence, no questions or allegations were raised by the Commission or any other third party concerning the legality of this donation.

The Dinner Committee no longer exists. Accordingly, the Commission should dismiss the complaint as applied to the Dinner Committee.

Respectfully submitt

William J. McGinley

Attachments

¹ The donation from Freddie Mac was deposited into the Dinner Committee's building fund account. (See attachment 3.) The donation was not deposited into any account used to finance any election activity. The proceeds from the Dinner Committee's building fund account were disbursed to the NRCC and NRSC's building fund accounts. (See id.) These donations were not used by the Dinner Committee in connection with any election at the federal, state or local level. Accordingly, the Dinner Committee complied with the building fund donation, disbursement and reporting requirements under the Act and Commission regulations.

STATEMENT OF DESIGNATION OF COUNSEL

MUR	5197	
NAME (OF COUNSEL: Benjamin Ginsberg/Bill McGinley	
FIRM:_	Patton Boggs, LLP	N.
ADDRE	SS: 2550 M Street, NW	•
	Washington, DC 20037	
Ţ	ELEPHONE:(202) 457-6000	
	FAX:(_ ²⁰²)_ ⁴⁵⁷⁻⁶³¹⁵	
and is a	The above-named individual is hereby designated as my conauthorized to receive any notifications and other communicate Commission and to act on my behalf before the Commission.	ations
Date	Signature	
RESPO	Trudy Matthes Barksdale, Treasurer ONDENT'S NAME: 1998 Republican House-Senate Dinner	
ADDRE		
	Columbia, Maryland 21045	
TELEP	PHONE: HOME()	
	301 596-7086 BUSINESS()	



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MS-K

Trudy Matthes Barksdale, Treasurer 1998 Republican House-Senate Dinner 7285 Swan Point Way Columbia, MD 21045

AUG 27 1999

Identification Number:

C00333344

Reference:

Termination Report (1/1/99-6/30/99)

Dear Ms. Barksdale:

Your committee's filing has been accepted as a valid termination because it meets the conditions set forth in 2 U.S.C. §433(d) and 11 CFR §102.3. Your committee is no longer required to file reports on a periodic basis. However, 2 U.S.C. §432(d) and 11 CFR §§102.9(c) and 104.14(b)(3) require that you maintain your records and copies of reports for inspection for at least three (3) years. In addition, you may be required to respond to Commission requests for information regarding your committee's federal election activity and previously filed reports.

If your committee again becomes active in federal elections, it will be required to re-register with the Commission in accordance with the Federal Election Campaign Act and applicable Regulations. Your committee will be treated as a new entity by the Commission and should register as a new committee on FEC FORM 1, pursuant to 2 U.S.C. §§432(g) and 433(a).

Political committees and separate segregated funds which once attained multicandidate committee status and subsequently terminated will, upon re-registration, again be required to meet the criteria set forth in 2 U.S.C. §441a(a)(4).

If you have any questions concerning your status and requirements, please contact the Reports Analysis Division on the toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely

Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

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